

# Exhibit 4

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BBC GROUP NV LLC, a Nevada Limited  
Liability Company,

Plaintiff,

vs.

ISLAND LIFE RESTAURANT GROUP LLC,  
a Washington Limited Liability Co.; ALEX  
PRINDLE, a Washington Resident; BRIAN  
O'CONNOR, a Washington Resident,

Defendants.

NO. 2:18-cv-01011 RSM

PLAINTIFF'S RESPONSES TO  
DEFENDANT'S OCTOBER 2018  
REQUESTS FOR PRODUCTION.

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the orders of this Court, Plaintiff BBC GROUP NV LLC ("BBC") submits the following objections and responses to Defendant ISLAND LIFE RESTAURANT ("Island Life") First Set of Interrogatories ("Interrogatories"). These responses are made solely for the purpose of this action, and are subject to objections as to relevance, materiality, and admissibility.

Investigations in this matter are ongoing. Therefore, these responses and objections are based upon information that is currently known or readily ascertainable by BBC after a reasonable and diligent investigation. BBC reserves the right to amend, modify, revise, or supplement these responses as necessary.

**GENERAL OBJECTIONS**

The following general objections apply to each and every request contained in Defendants' requests, including its definitions and instructions, and each of the general objections is incorporated by reference into the specific objections to each request, regardless of whether the specific objections overlap or repeat the general objection

1. Plaintiff BBC Group NV LLC ("BBC" or "BBC Group NV LLC") objects to the requests to the extent that they seek documents and information subject to (a) attorney-client privilege, (b) work product immunity, (c) joint defense privilege, (d) common interest privilege, or (e) any other applicable privilege, immunity, or protection. BBC Group NV LLC does not intend to produce such privileged or protected documents or things, and the inadvertent production of such is not to be deemed a waiver of any privilege. BBC Group NV LLC expressly reserves the right to object to the introduction at trial or any other use of such documents or things that may be inadvertently disclosed. In addition, BBC Group NV LLC objects to the requests and all other definitions and instructions to the extent they seek and/or require BBC Group NV LLC to produce a privilege log for documents or things falling within the attorney-client privilege or work-product doctrine, if such documents or things were created after the date that this lawsuit was filed. An objection based on the attorney-client privilege and/or the work product doctrine shall not be construed as a representation that such document or thing exists or existed. Such objections indicate only that the requests are of such a scope as to embrace subject matter protected by the attorney-client privilege, the work product doctrine, or other protection or privilege.

2. Any production of such documents and information, except pursuant to a written agreement concerning them, is inadvertent and shall not constitute a waiver of any privilege or protection.

1 3. BBC Group NV LLC objects to the requests to the extent that they seek documents,  
2 information, and things (a) not relevant to the subject matter of this investigation, (b) not  
3 reasonably calculated to lead to the discovery of admissible evidence, or (c) otherwise not within  
4 the scope of relevant discovery.

5 4. BBC Group NV LLC objects to the requests to the extent that they seek to impose an  
6 improper or undue burden on BBC Group NV LLC, or duties and responsibilities greater than  
7 those imposed by the Federal Rules of Civil Procedure, and the local Rules.

8 5. BBC Group NV LLC objects to the requests to the extent that they seek to impose an  
9 obligation to identify or search for documents at any location other than that at which they would  
10 be expected to be stored in the ordinary course of business.

11 6. BBC Group NV LLC objects to the requests to the extent they seek documents and things  
12 that do not exist or are beyond BBC Group NV LLC's possession, custody, or control.

13 7. BBC Group NV LLC objects to the requests to the extent they seek documents and things  
14 that are equally or more readily available to Defendants.

15 8. BBC Group NV LLC objects to the requests to the extent that they use terms or  
16 definitions that are vague, ambiguous, confusing, overbroad, unduly burdensome, or are not  
17 defined or understood. BBC Group NV LLC will interpret the terms and phrases used in the  
18 requests as they are reasonably understood by BBC Group NV LLC. In many instances, BBC  
19 Group NV LLC will specify exactly what term is vague or causes the request to be overbroad, or  
20 BBC Group NV LLC will provide a specific understanding of that term or scope of relevance for  
21 the purposes of responding to a particular request. That does not mean that terms not specifically  
22 addressed by BBC Group NV LLC are clear or of appropriate scope or that BBC Group NV LLC's  
23 understanding of them is the same as Defendants'. Rather, in addressing specific terms, BBC  
24  
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1 Group NV LLC is attempting to identify potential conflicts or ambiguities in terminology as early  
2 as possible so that the parties may expeditiously resolve discovery disputes during the course of  
3 this investigation.

4 9. BBC Group NV LLC objects to the requests to the extent they are not limited in time.

5 10. BBC Group NV LLC objects to the requests to the extent they request documents and  
6 things that are subject to a claim of confidentiality from a third party.

7 11. BBC Group NV LLC objects to the requests to the extent individual requests are  
8 compound, and thereby render this request unduly burdensome.

9 12. BBC Group NV LLC objects to the requests to the extent they seek documents and  
10 things relating to BBC Group NV LLC's claims and defenses at this time and are thereby  
11 premature. BBC Group NV LLC will respond either as required by the procedural schedule or  
12 agreement of the parties, or once BBC Group NV LLC has had an adequate opportunity to fully  
13 investigate based on information in the possession of, or under the control of Defendants.

14 13. BBC Group NV LLC further objects to these requests and all other definitions and  
15 instructions to the extent they seek documents or things that are confidential, financial,  
16 proprietary, trade secret or other confidential or sensitive business information relating to BBC  
17 Group NV LLC or any third party without the relevance of such information being shown, the  
18 entry of a protective order to adequately protect BBC Group NV LLC and/or third party  
19 information, and/or the consent of any applicable third party.

20 14. BBC Group NV LLC objects to each request and all other definitions and instructions  
21 to the extent the burden or expense of the proposed discovery outweighs its likely benefit, given  
22 the needs of the case, the amount in controversy, the parties' resources, the importance of the  
23  
24  
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1 issues at stake in the litigation, and the importance of the proposed discovery in resolving the  
2 issues.

3 15. BBC Group NV LLC objects to each request and all other definitions and instructions  
4 to the extent they seek documents or things that are in the nature of a legal conclusion.

5 16. BBC Group NV LLC objects to each request and all other definitions and instructions  
6 the extent they seek documents or things that are in the nature of an expert opinion.

7 17. BBC Group NV LLC has not yet completed a full investigation, collection of  
8 information, discovery and analysis relating to this action. The following response is based on  
9 information known and available to BBC Group NV LLC at this time. Discovery in this litigation  
10 is ongoing. BBC Group NV LLC reserves the right to amend, supplement, or otherwise change its  
11 response to these Requests should any additional information become available to it. BBC Group  
12 NV LLC also reserves the right to produce additional evidence at trial.

13  
14 18. BBC Group NV LLC's agreement to produce documents or things in response to  
15 Defendants' Requests, shall not be deemed as an admission regarding the relevance of the  
16 requested documents or things, nor is it intended to waive any right to object to the admissibility  
17 of such at trial.

18 19. The General Objections apply to all of BBC Group NV LLC's Responses to  
19 Defendants' Requests. To the extent that specific objections are also cited in response to specific  
20 Instructions, Definitions, and Requests, those specific citations are provided because they are  
21 believed to be particularly applicable to the request and are not to be construed as a waiver of any  
22 other General Objections applicable to information falling within the scope of the request.  
23  
24  
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**RESPONSES TO REQUESTS FOR PRODUCTION**

Subject to and without waiving the foregoing General Objections, BBC responds to Island Life's Interrogatories as follows:

**REQUEST FOR PRODUCTION NO. 1:**

Please provide all documents regarding the setup of the "Bok Bok" restaurants including any business plans, meeting minutes, business model, and documents detailing the structure and organization of the restaurants.

**RESPONSE TO INTERROGATORY NO. 1:**

BBC incorporates each of the General Objections in this response as though they were set forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly burdensome and/or overbroad. BBC also further objects to this Request as the request seeks documents and things that are Confidential in nature and can only be disclosed after the entry of a protective order protecting certain documents as Attorney's Eyes Only and/or confidential.

BBC offers to meet and confer with Defendants in an attempt to resolve these objections at a mutually convenient date and time.

BBC expressly reserves the right to supplement and/or amend this response as its investigation continues and as further information becomes available.

**REQUEST FOR PRODUCTION NO. 2:**

Please produce documents related to any expansion plans that you may have, and as specified in Interrogatory 2.



**RESPONSE TO REQUEST FOR PRODUCTION NO.2:**

BBC incorporates each of the General Objections in this response as though they were set forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly burdensome and/or overbroad. BBC also further objects to this Request as the request seeks documents and things that are Confidential in nature and can only be disclosed after the entry of a protective order protecting certain documents as Attorney's Eyes Only and/or Confidential.

BBC offers to meet and confer with Defendants in an attempt to resolve these objections at a mutually convenient date and time.

BBC expressly reserves the right to supplement and/or amend this response as its investigation continues and as further information becomes available.

**REQUEST FOR PRODUCTION NO. 3:** Please identify any loan that BBC has secured to build and operate present and future "Bok Bok" Restaurants.

**RESPONSE TO REQUEST FOR PRODUCTION NO.3:**

BBC incorporates each of the General Objections in this response as though they were set forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly burdensome and/or overbroad. BBC also further objects to this Request as the request seeks documents and things that are Confidential in nature and can only be disclosed after the entry of a protective order protecting certain documents as Attorney's Eyes Only and/or confidential.

BBC offers to meet and confer with Defendants in an attempt to resolve these objections at a mutually convenient date and time.

BBC expressly reserves the right to supplement and/or amend this response as its investigation continues and as further information becomes available.



1 Subject to and without waiving the objections recited above, BBC does not currently  
2 have any loans and is unaware of any documents that would be responsive to this request.

3 **REQUEST FOR PRODUCTION NO. 4:**

4 Please produce those portions of any diary, journal, calendar, or similar record kept by  
5 BBC or its officers/corporate representatives during the last five (5) years that refer to or relate to  
6 the creation of, selection of, and use of the names “bok a bok”, “BOK BOK” or “BOCBOC  
7 Chicken Delight”.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

9 BBC incorporates each of the General Objections in this response as though they were set  
10 forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly  
11 burdensome and/or overbroad. “BOCBOC Chicken Delight” is interpreted by BBC to be  
12 BOCBOC Chicken Delight. BBC also further objects to this Request as the request seeks  
13 documents and things that are Confidential in nature and can only be disclosed after the entry of a  
14 protective order protecting certain documents as Attorney’s Eyes Only and/or confidential. BBC  
15 further objects to the compound nature of the Request regarding the three different marks. BBC  
16 has never used the “bok a bok” name and therefore such documents cannot exist. BBC further  
17 objects that the Request seek documents, information, and things (a) not relevant to the subject  
18 matter of this investigation, (b) not reasonably calculated to lead to the discovery of admissible  
19 evidence, or (c) otherwise not within the scope of relevant discovery.  
20

21 BBC offers to meet and confer with Defendants in an attempt to resolve these objections  
22 at a mutually convenient date and time.

23 BBC expressly reserves the right to supplement and/or amend this response as its  
24 investigation continues and as further information becomes available.  
25

**REQUEST FOR PRODUCTION NO. 5:**

Produce all documents that you believe supports your response to the preceding interrogatory regarding damages.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

BBC incorporates each of the General Objections in this response as though they were set forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly burdensome and/or overbroad. BBC further objects to the requests to the extent they seek documents and things relating to BBC's claims and defenses at this time and are thereby premature. BBC also further objects to this Request as the request seeks documents and things that are Confidential in nature and can only be disclosed after the entry of a protective order protecting certain documents as Attorney's Eyes Only and/or confidential.

BBC offers to meet and confer with Defendants in an attempt to resolve these objections at a mutually convenient date and time.

BBC expressly reserves the right to supplement and/or amend this response as its investigation continues and as further information becomes available.

**REQUEST FOR PRODUCTION NO. 6:**

Please produce documents that reflect confusion between the marks bok a bok, BOKBOK, and/or BOCBOC Chicken Delight.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

BBC incorporates each of the General Objections in this response as though they were set forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly burdensome and/or overbroad. BBC further objects to the requests to the extent they seek

documents and things relating to BBC's claims and defenses at this time and are thereby premature. BBC also further objects to this Request as the request seeks documents and things that are Confidential in nature and can only be disclosed after the entry of a protective order protecting certain documents as Attorney's Eyes Only and/or confidential. BBC objects to the request to the extent they seek documents and things that are equally or more readily available to Defendants such as Defendants' purported evidence of confusion and Mr. Prindle's April 2018 letter to Plaintiff.

BBC offers to meet and confer with Defendants in an attempt to resolve these objections at a mutually convenient date and time.

BBC expressly reserves the right to supplement and/or amend this response as its investigation continues and as further information becomes available.

#### **REQUEST FOR PRODUCTION NO. 7:**

Other than documents containing attorney-client privileged or work product information, produce all documents that you possess related to your claimed right to use the name BOKBOK and or BOCBOC Chicken Delight.

#### **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

BBC incorporates each of the General Objections in this response as though they were set forth in full herein. BBC further objects to the requests to the extent they seek documents and things relating to BBC's claims and defenses at this time and are thereby premature. BBC also further objects to this Request as the request seeks documents and things that are Confidential in nature and can only be disclosed after the entry of a protective order protecting certain



documents as Attorney's Eyes Only and/or confidential. BBC offers to meet and confer with Defendants in an attempt to resolve these objections at a mutually convenient date and time.

BBC expressly reserves the right to supplement and/or amend this response as its investigation continues and as further information becomes available.

**REQUEST FOR PRODUCTION NO. 8:**

Produce all statements identified in the prior Interrogatory [Interrogatory NO. 5]

**RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

BBC incorporates each of the General Objections in this response as though they were set forth in full herein. Further subject to the answer and objections provided in the Response to Interrogatory No. 5, BBC does not believe that any documents currently exist responsive to this Request.

BBC expressly reserves the right to supplement and/or amend this response as its investigation continues and as further information becomes available.

**REQUEST FOR PRODUCTION NO. 9:**

Please produce documents in your possession that support your answer to the preceding Interrogatory [No.6].

**RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

BBC incorporates each of the General Objections in this response as though they were set forth in full herein. Further subject to the answer and objections provided in the Response to Interrogatory No. 6, BBC does not believe that any documents currently exist responsive to this Request. Communication regarding creation, selection, and use were internal discussions within BBC.

1 BBC expressly reserves the right to supplement and/or amend this response as its  
2 investigation continues and as further information becomes available.

3  
4 **REQUEST FOR PRODUCTION NO. 10:**

5 Produce all evidence, other than the assignment contract, that reflects that BOKBOK in  
6 Nevada received any goodwill from the restaurant BOCBOC Chicken Delight in New York.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

8 BBC incorporates each of the General Objections in this response as though they were set  
9 forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly  
10 burdensome and/or overbroad. BBC also further objects to this Request as the request seeks  
11 documents and things that are Confidential in nature and can only be disclosed after the entry of  
12 a protective order protecting certain documents as Attorney's Eyes Only and/or confidential.

13 BBC offers to meet and confer with Defendants in an attempt to resolve these objections  
14 at a mutually convenient date and time.

15  
16 BBC expressly reserves the right to supplement and/or amend this response as its  
17 investigation continues and as further information becomes available.

18 **REQUEST FOR PRODUCTION NO. 11:**

19 Please produce all documents exchanged between BBC and/or its attorneys and Guang-  
20 Yang Li and/or his Attorneys.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

22 BBC incorporates each of the General Objections in this response as though they were set  
23 forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly  
24 burdensome and/or overbroad. BBC also further objects to this Request as the request seeks  
25

1 documents and things subject to a claim of confidentiality from a third party and/or confidential  
2 in nature and can only be disclosed after the entry of a protective order protecting certain  
3 documents as Attorney's Eyes Only and/or confidential.

4 BBC further objects to this Request because this Request is so broadly worded that it  
5 requests information that is covered under the attorney client privilege or under the attorney  
6 work-product exception.

7 BBC offers to meet and confer with Defendants in an attempt to resolve these objections at a  
8 mutually convenient date and time.

9 BBC expressly reserves the right to supplement and/or amend this response as its  
10 investigation continues and as further information becomes available.

11  
12 DATED this 3rd day of December, 2018.

13  
14 Respectfully submitted,

15 By: /S/ Joe Chalverus  
16 Joseph Chalverus  
17 /S/ Tracy Heims  
18 /S/ Lynette Wylie  
19 APEX JURIS PLLC  
12733 Lake City Way NE  
Seattle, WA 98125  
Tel.: (206) 664-0314

20 /S/Nihat Deniz Bayramoglu (pro hac vice)  
21 Nihat Deniz Bayramoglu  
22 Bayramoglu Law Offices LLC  
1540 West Warm Springs Road  
Henderson, NV 89014  
23 Tel: (702) 462-5973  
24 *Attorneys for Plaintiff*



**CERTIFICATE OF SERVICE**

I, hereby certify, that, on December 3rd, 2018, I caused the foregoing document to be served by the method indicated below on the parties listed below:

Joseph Chalverus  
Tracy Heims  
Lynette Wylie  
APEX JURIS PLLC  
12733 Lake City Way NE  
Seattle, WA 98125  
Tel.: (206) 664-0314  
chalveruslaw@gmail.com  
lynette@apexjuris.com  
tracy@apexjuris.com

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*Attorneys for Plaintiff*  
Kathryn Childers  
Joel E. Wright  
Marc Rosenburg  
Gregory P. Turner  
LEE SMART P.S. Inc.  
1800 One Convention Street  
701 Pike Street  
Seattle, Washington 98101

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*Attorneys for Defendants*

I am not a party to nor interested in the action and I am over the age of eighteen (18) years.

DATED this 3rd day of December, 2018.

/S/ Alecia Smith  
Alecia Smith  
Bayramoglu Law Offices LLC  
1540 West Warm Springs Road Suite 100  
Henderson, NV 89014  
702 462 5973

*Attorneys for Plaintiff*